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Attorneys for Defendants Carco Group, Inc. and Intellicorp Records, Inc.

## IN THE UNITED STATES DISTRICT COURT DISTRICT OF NEW JERSEY

ATLAS DATA PRIVACY CORPORATION, as assignee of individuals who are Covered Persons, JANE DOE-1, a law enforcement officer, JANE DOE-2, a law enforcement officer, EDWIN MALDONADO, SCOTT MALONEY, JUSTYNA MALONEY, PATRICK COLLIGAN, PETER ANDREYEV, and WILLIAM SULLIVAN,

(Electronically Filed)

Plaintiffs,

**CIVIL ACTION** 

v.

Civil Action No.

CARCO GROUP INC., INTELLICORP RECORDS, INC., RICHARD ROES 1-10, fictitious names of unknown individuals and ABC COMPANIES 1-10, fictitious names of unknown entities,

Defendants.

## **DECLARATION OF ANGELO A. STIO III**

- I, Angelo A. Stio III declare as follows:
- 1. I am a citizen of the United States, over 18 years of age, and competent to testify as to the matters contained in this Declaration. If called as a witness, I could and would competently testify as to these same facts.
  - 2. I am a partner with the law firm Troutman Pepper Hamilton Sanders, LLP, which

is representing Defendants Carco Group, Inc. and Intellicorp Records, Inc. (collectively the "Carco Defendants") in the above-captioned matter.

3. Attached as **Exhibit 1** is a true and accurate copy of Atlas' Daniel's Law Service

Terms, which are referenced in the Notice of Motion and being filed under seal.

4. Attached as **Exhibit 2** is a true and correct screenshot of the Franklin Township

Police Department webpage, listing Plaintiff Patrick Colligan as a Detective with the Franklin

Township Police Department.

5. Attached as **Exhibit 3** is a true and correct copy of Plaintiff Edwin Maldonado's

public facing LinkedIn profile identifying his current employer as the Union County Prosecutor's

Office.

6. Attached as **Exhibit 4** is a true and correct copy of Plaintiff Peter Andreyev's public

facing LinkedIn profile, identifying his current employer as the Point Pleasant Beach Police

Department.

7. Carco is a Delaware Corporation with its principal place of business is located in

Holtsville, New York.

8. Intellicorp is a Delaware Corporation with its principal place of business is located

in Holtsville, New York.

Pursuant to 28 U.S.C. 1746, I declare under penalty of perjury that the foregoing is true and

correct.

Executed on March 21, 2024

/s/ Angelo A. Stio, III
Angelo A. Stio III

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